

Edwards & Angell LLP

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VIA FACSIMILE (617) 227-4420
AND FIRST CLASS MAIL

John T. Bennett, Esq.
Palmer & Dodge, LLP
111 Huntington Avenue at Prudential Center
Boston, MA 02199

Re: Subpoena in a Civil Case, Case No.: 04-10535 PBS
Served Upon Robert I. Adler

Dear Mr. Bennett:

We represent Robert Adler in connection with the above-referenced Subpoena (the "Subpoena").

Pursuant to F.R.C.P. Rule 45, we hereby object to the Subpoena because it is overly broad, unduly burdensome, encompasses documents that need not be produced by reason of privilege, including but not limited to the attorney/client and attorney work product privileges, requests trade secret information, and does not provide a reasonable time within which to object and respond or reasonable advance notice of the taking of the deposition.

More specifically, the litigation in which the Subpoena has been issued concerns a narrow dispute over the alleged accessing and use of information on a Shareholder.com website. However, many of the document requests are considerably broader, covering all and irrelevant CCBN.com/The Thomson Corporation agreements, plans, strategies, capitalization, and all America Online and internet anomizer service accounts. See, for example, Request Nos. 24, 25, 28, 29 and 31. And, while the allegations in the complaint relate to 2002 and 2003 events, the document requests have no such time limitation, and some necessarily exceed the applicable time period. See, for example, Requests 28 through 31.

Other requests encompass personal information which is completely unrelated to CCBN.com or Shareholder.com. See, for example, Requests 29, 30 and 31.

Many of the requests improperly seek confidential protected trade secret information. See, for example, Requests 13 through 16, and 18 through 21.

Further, the time within which to respond to the Subpoena is inadequate, considerably less than what is normally required even when the respondent is a party to litigation.

Edwards & Angell_{LLP}

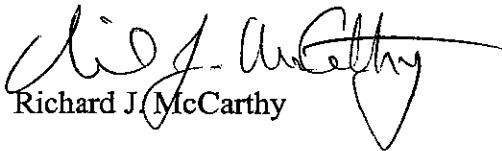
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December 7, 2004
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While there may be other applicable objections, the brief time within which time to respond does not permit consideration of all possible objections.

Please contact me after you have reviewed this letter to discuss the above-referenced Subpoena and the response thereto.

Very truly yours,


Richard J. McCarthy

RJM:clv